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U.S. Department of Justice

Washington, DC 20530

Supplemental Statement

Pursuant to the Foreign Agents Registration Act of 1938, as amended

	For 6 Month Period Ending 01/31/2021 (Insert date)				
		Ţ	- REGISTRA	, ,	
		1	- REGISTRA	AN I	
1.	(a) Name of Registrant				(b) Registration Number
	Teneo Strategy LLC				6698
	(c) Primary Business Address 280 Park Avenue, 4th Floor New York, NY 10017				
2.	Has there been a change in the inform	nation previously	furnished in con	nection with the fo	llowing?
	(a) If an individual:	Vag 🗖	МоП		
	(1) Residence address(es)(2) Citizenship	Yes □ Yes □	No □ No □		
	(3) Occupation	res □ Yes □	No □		
		162	NO [
	(b) If an organization:				
	(1) Name	Yes 🗆	No 🗷		
	(2) Ownership or control	Yes □	No ⊠		
	(3) Branch offices	Yes □	No 🗷		
	(c) Explain fully all changes, if any	v, indicated in Item	ns (a) and (b) ab	ove.	
	IF THE REGISTRANT				
3.	If the registrant previously filed an E period. Yes ☐ No ☑	xhibit C^1 , state wh	nether any chang	es therein have occ	curred during this 6 month reporting
	If yes, has the registrant filed an upd If no, please file the updated Exhibit		Yes 🗆	№ □	

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons becon Yes □	ne partners, officers, directors or si	imilar officials during this	6 month reporting per	iod?
If yes, furnish the follo	wing information:			
Name	Residence Address	Citizenship	Position	Date Assumed
(b) Have any persons cease Yes ⊾	d acting as partners, officers, direc	etors or similar officials of	the registrant during th	nis 6 month reporting period?
If yes, furnish the follow Name See attachment.	wing information: Position			Date Ceased
Yes	n Item 4(a) rendered services direction No	-	nterests of any foreign	principal?
• •	ch person and describe the service			
Name	Foreign Principal(s) l	Represented Services		
N/A				
	oorting period, has the registrant his to the registrant directly in furtherard or similar capacity? Yes Kanada Residence Address	nce of the interests of any		
See attachment.	residence reducts	Citizensinp	rosition	Date Assumed
connection with the reg	individuals, who have filed a shor istrant during this 6 month reportin	_	ent, terminated their en No □	nployment or
If yes, furnish the follow	-			
Name See attachment.	Position or Con	nection	Ε	Date Terminated
	individuals, who have filed a shor nonth reporting period? Yes	_	ent, terminated their co	nnection with any foreign
If yes, furnish the follow	wing information:			
Name See attachment.	Position or Connection	Foreign Principal	Ε	Pate Terminated
6. Have short form registration statement or submitted with	on statements been previously filed th this filing? Yes ☑	l by all of the persons nam No □	ed in Items 5(a) and 5(b) of the supplemental
	s who have not previously filed the		not submitting a short	form with this filing.

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II - FOREIGN PRINCIPAL

7.	Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period? Yes □ No ☑						
	If yes, furnish the follo	wing information:					
	Foreign Principal				Date of T	Termination	
8.	Has the registrant adde Yes ⋉	ed any new foreign princ No 🏻	ipal(s) ² during t	his 6 month repo	orting period	?	_
	If yes, furnish the follo	wing information:					
	Foreign Principal Letterone Investment Ho	dings S A			Date Add 08/26/202		
9.	In addition to those naticular the 6 month reposition of the following the 6 month reposition of the following the	orting period.	any, list the fore	ign principal(s)	whom the re	gistrant continued to represent	
10	-	filed Exhibits A and B f	-		ipal(s), if an	y, listed in Item 8?	_
	Exhibit A ³	Yes 🗷	No □	N/A □			
	Exhibit B ⁴ If no, please file th	Yes 🗷 ne required exhibit.	No 🗌	N/A □			
	represented during If yes, has the reg	g this 6 month period? istrant filed an amendme	_	Yes 🗷		orincipal(s) whom the registrant No No No	
	II no, piease ille ti	ne required amendment.					_

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

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III - ACTIVITIES

11.	During this 6 month reportation principal named in Items			d in any activities Yes ☑	s for or rendered any services to any for No □	eign
	If yes, identify each foreign	ign principal and o	describe in full detail	all activities and	services:	
	Foreign Principal See attachment.		Activities/Se	rvices		
12	During this 6 month range	arting period has t	ha ragistront on hah	alf of any foreign	n principal, engaged in political activity	5
12.	as defined below?	Yes 🗷	No 🗆	an or any foreign	i principai, engaged in pondear activity	
	If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dat places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.					
	Set forth below a general See attachment.	l description of the	e registrant's politica	l activities.		
	Set forth below in the rec	quired detail the re	egistrant's political ac	ctivities.		
	Foreign Principal	Date	Contact	Method	Purpose	
13.	In addition to the above of	described activitie	s, if any, has the regi	istrant engaged in	activity or rendered any services on its	own
	behalf which benefits the	e registrant's foreig	gn principal(s)?	Yes 🗆	No 🗷	
	If yes, describe fully.					
	Foreign Principal		Act	ivities/Services		

^{5 &}quot;Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

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IV - FINANCIAL INFORMATION

14. (a)	RECEIPTS-MONIES During this 6 month reporting period, has the registrant received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes No						
	If no, please explain	why no monies were received.					
	If yes, set forth below	v in the required detail and sepa	arately for each fore	ign principal an acc	count of such mo	nies. ⁶	
	Foreign Principal See attachment.	Date Received From Who	om Purpos	e	Amount	Subtotal	
					_	Total	
(b)		PRAISING CAMPAIGN reporting period, has the regist	rant received, as pa	rt of a fundraising c	ampaign ⁷ , any m	oney on behalf	
	of any foreign princip	oal named in Items 7, 8, or 9 of	this statement?	Yes □	No 🗷		
	If yes, has the registre	ant previously filed an Exhibit	D ⁸ to its registration	n? Yes □	No □		
	If yes, indicate the	e date the Exhibit D was filed.	Date				
	If no, please file the	he required Exhibit D.					
(c)		reporting period, has the registrated in Items 7, 8, or 9 of this start Yes \(\square\) No \(\square\)					
	If yes, furnish the following information:						
	Foreign Principal	Date Received	From Whom	Purpose	Thing of V	/alue	

^{6, 7} A registrant is required to file an Exhibit D if he/she collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

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principal?	Yes ⋉	No □			
If no, explain why no	o disbursement	s were made.			
If yes, set forth below monies transmitted, i	w in the require	ed detail and separately foreign principal.	au for each foreign principa	al an account of such r	nonies, incl
Foreign Principal See attachment.	Date	Recipient	Purpose	Amount	Subtota

Received by NSD/FARA Registration Unit 03/02/2021 4:33:41 PM (PAGE 7) (b) **DISBURSEMENTS-THINGS OF VALUE** During this 6 month reporting period, has the registrant disposed of anything of value other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes \square No 🗷 If yes, furnish the following information: Foreign Principal Thing of Value Date Recipient Purpose (c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value 11 in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ▼ No □ If yes, furnish the following information:

Political Organization/Candidate Method

Amount/Thing of Value

Date

See attachment.

Donor

^{10, 11} Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

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V - INFORMATIONAL MATERIALS

16. (a)	During this 6 n	nonth reporting period	has the registrant	prepared, disseminated or cau	used to be disseminated any
10. (u)	informational		-		ased to be disseminated any
	moniationari	materials: 103	110		
(b)		each such foreign prings in this section.	cipal for which in	formational materials were dis	sseminated and respond to the
17. Du	ring this 6 month	h reporting period, has:	a budget been esta	iblished or specified sum of m	oney allocated to finance the
	_	es in preparing or dissen	_	_	_
If y	es, identify each	n such foreign principal	, and specify the p	period of time and the amount.	
For	eign Principal		Р	eriod of Time	Amount
		h reporting period, has trials included the use of			ating or causing the dissemination of
		iper	-	☐ Press releases	☐ Pamphlets or other publications
☐ Lect	ures or speeches	s 🔲 Radio or T	V broadcasts	☐ Motion picture films	☐ Letters or telegrams
☐ Ema					
☐ Web	site URL(s):				
☐ Soci	al media website	es URL(s):			
☐ Othe	r (specify)				
19. Dui	ring this 6 month	h reporting period, has	the registrant prep		to be disseminated informational
	_	y of the following grou	_		
	Public officia	lls	☐ Newspap	ers	☐ Libraries
	Legislators		☐ Editors		☐ Educational institutions
	Government a	agencies	☐ Civic gro	ups or associations	☐ Nationality groups
	Other (specify	v)			
20. Ind	icate the langua	ge used in the informati	ional materials:		
] English	D		(specify)	
L	1 Eugusu			specify)	
	_		-	nt of Justice a copy of each ite this 6 month reporting period?	em of such informational materials ? Yes \(\square\) No \(\square\)
If n	o, please please	file the required inform	national materials.		
22. Has	s the registrant la	abeled each item of suc	h informational m	aterials with the statement rec	quired by Section 4(b) of the Act?
3	Yes □	No 🗆			

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

(PA	GE.	9)

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 et seq., that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature 13
March 2, 2021	Richard Powell	Sign /s/ Richard Powell
		Sign
		Sign
		Sign

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

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Question No. 4(b): Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

If so, furnish the following information:

Name	Position	Date Ceased
Douglas Band	President	12/07/2020

Question No. 5(b): During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity?

Yes
No

Name	Residence Address	Citizenship	Position	Date Assumed
Emily Cummings	On file with FARA Unit	US	Consultant	08/26/2020
Paul Gallagher	On file with FARA Unit	US	Consultant	08/26/2020
Lauren Lutz	On file with FARA Unit	US	Consultant	09/11/2020
Nicole Sinclair	On file with FARA Unit	US	Consultant	08/26/2020

While hired by the registrant prior to this reporting period, the aforementioned individuals all began work on behalf of a foreign principal during the period covered by this supplemental statement.

Question No. 5(c): Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☑ No □

If so, furnish the following information:

Name	Position/Connection	Date Terminated
Douglas Band	President	12/07/2020

Question No. 5(d): Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☑ No ☐

If so, furnish the following information:

Name	Position/Connection	Foreign Principal	Date Terminated
Faten Alqaseer	Consultant	NEOM Company	12/31/2020
Jack Coster	Consultant	NEOM Company	12/31/2020
Kathleen Lacey	Consultant	NEOM Company	12/31/2020
Dara Pavlich	Consultant	NEOM Company	12/31/2020
Sybille St. Arromand	Consultant	NEOM Company	12/31/2020

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Teneo Strategy LLC FARA Supplemental Statement for the period August 1, 2020 – January 31, 2021 Attachment (PAGE 11)

Question No. 11: During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, and 9 of this statement? Yes ☑ No □

If yes, identify each such foreign principal and describe in full detail your activities and services:

For **NEOM Company**, the registrant provided support for the NEOM Communications Department, including: overall strategic communications counsel; day-to-day counsel and support on external and internal communications and media relations activities (including review of documents prepared by NEOM Communications); development of NEOM Sector messaging (sector communications strategies and implementation to be handled by NEOM Marketing and Communications); media training for senior NEOM executives; close coordination with NEOM's Marketing Department and other NEOM communications and marketing agencies to implement communications activities; and issues and crisis communications counsel.

For the **Salama bint Hamdan Al Nahyan Foundation**, the registrant provided communications and media relations services to the foreign principal, including stakeholder research, narrative development, development and execution of an international communications strategy, crisis preparedness and response strategy development, and media relations support. The registrant also developed for the foreign principal a communications strategy and plan for the UAE 50th anniversary celebration, including advisory, planning, and narrative development services.

For **Letterone Investment Holdings S.A.**, the registrant provided strategic counsel and stakeholder engagement advice to the foreign principal and its directors (including scheduling media interviews, assisting with media briefings, coordinating stakeholder engagements, and related activities).

Question No. 12: During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below? Yes ☑ No □

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

For **NEOM Company**, the registrant provided support for the NEOM Communications Department, including: overall strategic communications counsel; day-to-day counsel and support on external and internal communications and media relations activities (including review of documents prepared by NEOM Communications); development of NEOM Sector messaging (sector communications strategies and implementation to be handled by NEOM Marketing and Communications); media training for senior NEOM executives; close coordination with NEOM's Marketing Department and other NEOM communications and marketing agencies to implement communications activities; and issues and crisis communications counsel. The registrant did not engage in communications with U.S. government officials or members of the media on behalf of the foreign principal.

For the **Salama bint Hamdan Al Nahyan Foundation**, the registrant provided communications and media relations services to the foreign principal, including stakeholder research, narrative development, development and execution of an international communications strategy, crisis preparedness and response strategy development, and media relations support. The registrant also developed for the foreign principal a communications strategy and plan for the UAE 50th anniversary celebration, including advisory, planning, and narrative development services. The registrant did not engage in communications with U.S. government officials or members of the media on behalf of the foreign principal.

For **Letterone Investment Holdings S.A.**, the registrant provided strategic counsel and stakeholder engagement advice to the foreign principal and its directors (including scheduling media interviews, assisting with media briefings, coordinating stakeholder engagements, including with think tanks, and related activities). The registrant did not engage in

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communications with U.S. government officials on behalf of the foreign principal. Details regarding the registrant's contacts with members of the media are included in the log below.

Date	Contact	Method	Purpose		
Letterone Investment Holdings S.A.					
11/16/2020	Caroline Hyde, Co-Host, Bloomberg TV	E-mail	Scheduling appearance for Letterone Chairman Lord Mervyn Davies		
11/30/2020	Jennifer Sherwood, Head of Talent and Booking, Yahoo! Finance	E-mail	Scheduling appearance for Letterone Chairman Lord Mervyn Davies		
01/13/2021	Dana Glasman, Sponsorship Sales, Bloomberg	E-mail	Introduction to sponsorship events at Bloomberg		
01/26/2021	Gillian Tett, Chair of Editorial Board; Editor-at-Large, US, Financial Times	E-mail	Scheduling conversation with Letterone Chairman Lord Mervyn Davies		
01/27/2021	Donna Burton, Senior Producer, "Closing Bell", CNBC	E-mail	Scheduling appearance for Letterone Chairman Lord Mervyn Davies		
01/27/2021	Liz Claman, Anchor, Fox Business	E-mail	Scheduling appearance for Letterone Chairman Lord Mervyn Davies		

Question No. 14(a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, and 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ⊠ No □

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

Date	From Whom Purpose		Amount
NEOM Company			
09/28/2020	NEOM Company	Expenses	\$36,909.40
11/19/2020	NEOM Company	Expenses	\$193,972.26
11/20/2020	NEOM Company	Expenses	\$10,209.07
11/20/2020	NEOM Company	Fees	\$250,032.42
11/27/2020	NEOM Company	Fees	\$142,500.00
12/28/2020	NEOM Company	Fees	\$926,250.01
		TOTAL	\$1,559,873.16
		•	*
Salama bint Hamd	an Al Nahyan Foundation		
09/04/2020	Salama bint Hamdan Al	Fees	\$500,000.00
	Nahyan Foundation		
10/09/2020	Salama bint Hamdan Al	Fees	\$250,000.00
1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	Nahyan Foundation		

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Date	e From Whom		Amount
11/02/2020	Salama bint Hamdan Al Nahyan Foundation	Fees	\$250,000.00
12/01/2020	Salama bint Hamdan Al Nahyan Foundation	Fees	\$250,000.00
12/16/2020	Salama bint Hamdan Al Nahyan Foundation	Fees	\$732,000.00
	·	TOTAL	\$1,982,000.00
Letterone Investme	ent Holdings S.A.		
09/21/2020	Letterone Investment Holdings S.A.	Fees	\$150,000.00
11/12/2020	Letterone Investment Holdings S.A.	Fees	\$150,000.00
12/18/2020	Letterone Investment Holdings S.A.	Fees	\$150,000.00
01/12/2021	Letterone Investment Holdings S.A.	Fees	\$150,000.00
		TOTAL	\$600,000.00
		TOTAL RECEIPTS	\$4,141,873.16

Question No. 15(a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended	monies in conne	ction with	activity on behalf of any foreign principal named in Items 7, 8, a	nd
9 of this statement?	Yes 🗵	No □		

(2) transmitted monies to any such foreign principal? Yes □ No ⊠

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	Recipient	Purpose	Amount
Salama bii	nt Hamdan Al Nal	hyan Foundation	
Various	Various	Office Expenses (tablets; COVID tests)	\$3,962.81
12/31/2020		Meals (no meal expenses for U.S. Government officials or media)	\$32.67
Various	Various	Local Transportation (taxis; no travel expenses for U.S. Government officials or media)	\$404.93
Various	Various	Out-of-Town Travel (hotels; no travel expenses for U.S. Government officials or media)	\$326.70
09/01/2020	EMI Research Solutions	Survey sample for China*	\$6,972.00
10/02/2020	Toluna USA, Inc.	Survey sample for the US and 27 additional countries**	\$105,000.00
10/16/2020	0/16/2020 Quick Tab Associates, Inc. Data tabulations for survey**		\$1,786.00

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Date	Recipient	Purpose	Amount
12/14/2020	VisibleMR	Design of materials for survey**	\$10,500.00
		TOTAL DISBURSEMENTS***	\$128,985.11

^{*} This disbursement was made in connection with non-FARA registerable activities on behalf of the foreign principal.

The registrant did not disburse or expend monies on behalf of foreign principals NEOM Company or Letterone Investment Holdings S.A. during the period covered by this supplemental statement.

Question No. 15(c): DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☑ No □

If yes, furnish the following information:

Donor Name	Date	Political Organization/ Candidate	Method	Amount/Thing of Value
John Coster	09/02/2020	Biden for President	Online payment	\$300.00
	09/18/2020	Sara Gideon for Maine	Online payment	\$100.00
	09/21/2020	Theresa Greenfield for lowa	Online payment	\$50.00
	09/21/2020	Montanans for Bullock	Online payment	\$50.00
Emily Cummings	12/14/2020	Ray McGuire for Mayor	Online payment	\$50.00
Paul Gallagher	09/09/2020	Biden for President	Online payment	\$50.00
	09/14/2020	Biden for President	Online payment	\$50.00
Kathleen Lacey	08/01/2020	Connecticut Democratic State Central Committee	Online payment	\$25.00
	09/01/2020	Connecticut Democratic State Central Committee	Online payment	\$25.00
	10/01/2020	Connecticut Democratic State Central Committee	Online payment	\$25.00
	11/01/2020	Connecticut Democratic State Central Committee	Online payment	\$25.00
	12/01/2020	Connecticut Democratic State Central Committee	Online payment	\$25.00
	01/01/2021	Connecticut Democratic State Central Committee	Online payment	\$25.00
Padraic Riley	08/20/2020	Friends of Emmett Riley	Check	\$200.00

^{**} Approximately 97% of these disbursements were for non-FARA registerable activities on behalf of the foreign principal.

^{***} No disbursements are to be reimbursed by the foreign principal; all such expenses are covered by the registrant's fees.